

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Attachment 1: Statement Concerning Company Procedures

General duty, training, and discipline.

Orange Business Services U.S. Inc. (the “Company”) has adopted and distributed to all employees a confidentiality policy that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the confidentiality policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

Use of customer proprietary network information without customer approval (47 C.F.R. § 64.2005); Approval required for use of customer proprietary network information (47 C.F.R. § 64.2007); Notice required for use of customer proprietary network information (47 C.F.R. § 64.2008); Safeguards required for use of customer proprietary network information (47 C.F.R. § 64.2009)

The Company does not use, disclose, or permit access to CPNI for marketing purposes. The Company does not disclose CPNI to third parties or permit third parties to access or use CPNI except as permitted by law.

Safeguards on the disclosure of customer proprietary network information (47 C.F.R. § 64.2010)

The Company does not provide any telephone or in-store access to CPNI. Customers requesting CPNI by telephone will be provided with CPNI only by sending it to the customer’s address of record or by calling the customer at the telephone address of record.

Customers may access their CPNI online only after they have been authenticated without using readily available biographical information or account information. After initial authentication, customers may only access CPNI online by providing a password that is not prompted by a request for readily available biographical information or account information. Customers that have lost or forgotten their passwords may retrieve their passwords by proving an answer to a shared secret question. If a customer cannot provide the correct password or the correct response to the shared secret question, the customer must be reauthenticated and must establish a new password.

The Company notifies its customers immediately by email to the customer’s email address of record of any changes to customer password, answer to shared secret questions, online account information, or address of record. This notice does not reveal

the changed information and is sent to the existing address, not to an address or telephone number that has been changed.

Notification of customer proprietary information security breaches (47 C.F.R. § 64.2011)

The Company's operating procedures require notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. The Company maintains records of any breaches discovered, notifications made to law enforcement, and notifications made to customers. These records include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. The Company retains these records for 2 years.